

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRAINTREE HOSPITAL LLC)
d/b/a Northeast Specialty Hospital)
of Braintree,)
Plaintiff,) CIVIL ACTION
vs.) NO. 04-12136REK
VIRGINIA SULLIVAN, JOHN SULLIVAN,)
and PLUMBERS UNION LOCAL 12)
WELFARE FUND)
Defendants.)

MOTION TO WITHDRAW AS COUNSEL

Now comes David W. Healey and requests leave of the Court to withdraw as counsel for the Defendant Plumbers Union Local 12 Welfare Fund. As grounds therefore, counsel states that the Defendant Plumbers Union Local 12 Welfare Fund has retained successor counsel, Robert M. Cheverie, who has filed an appearance in this matter, and that I am no longer counsel of record.

Respectfully submitted,

/s/ David W. Healey
David W. Healey (BBO# 548262)
DAVID W. HEALEY & ASSOCIATES
77 Franklin Street, Suite 805
Boston, MA 02110
(617) 457-3131

CERTIFICATE OF SERVICE

I, David W. Healey, hereby certify that on May 27, 2005 I caused to be served a copy of this instrument by mailing same first class mail, postage prepaid, to Anthony J. Pignone, 909 Sumner Street, Stoughton, MA 02072; Mark Cavanaugh, Kerstein, Coren, Lichtenstein & Finkel LLP, 233 Needham Street, Newton, MA 02464-1502; and to Robert M. Cheverie, Robert M. Cheverie & Associates, P.C., Commerce Center One, 333 East River Drive, Suite 101, East Hartford, CT 06108.

/s/ David W. Healey
David W. Healey